



Cornell University
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(not for service of pleadings)

VIA ECF

April 15, 2020

Hon. Glenn T. Suddaby
Chief U.S. District Judge, N.D.N.Y.
Federal Building and U.S. Courthouse
P.O. Box 7367
Syracuse, New York 13261-7367

Re: Denise Payne v. Cornell University
U.S. District Court, Northern District of New York
Case No. 18-cv-1442 (GTS-ML)

Dear Chief Judge Suddaby:

I am writing, respectfully, and with the consent of Plaintiff's counsel, to Your Honor to request an extension of two weeks to file reply papers to respond to Plaintiff's opposition filed last night and to further support Defendant Cornell University's motion for summary judgment in this action. Under the current Motion Schedule, the reply papers are due April 20, 2020, and the Return Date for the motion (on submission) is April 30, 2020. *See* ECF No. 28. The two-week extension to which Plaintiff's counsel consented would adjust the Motion Schedule to require Cornell's reply papers by May 4, 2020, and would move the motion return date (on submission) to May 14, 2020.

Due to the COVID-19 pandemic, Cornell employees, including those in Cornell's Office of University Counsel, are working remotely from home and, at times, on a reduced schedule due to health and childcare issues. These circumstances will make it difficult to confer with employees with relevant knowledge of the underlying subject matter of this lawsuit. As such, we are seeking additional time to complete reply papers.

If this request meets with Your Honor's approval, please enter an order adjusting the Motion Schedule accordingly. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam Gregory Pence".

Adam Gregory Pence
Associate University Counsel

cc: (via ECF)
Gabrielle Vinci, Esq.
Nesenoff & Miltenberg, LLP
Attorneys for Plaintiff